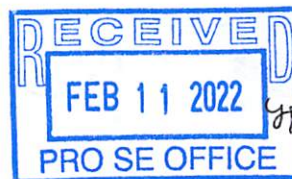


★ FEB 11 2022 ★

BROOKLYN OFFICE



February 07, 2022

Delivery via United States Mail

The Honorable Raymond J. Dearie  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

in re: United States v. Brown, case No. 19-CR-139 (RJD) #4

Dear Judge Dearie:

The defendant, Andre Wilburn, respectfully writes the Court to assert his speedy trial right pursuant to the Sixth Amendment to the United States Constitution.

The Court has not formally accepted the defendant's guilty plea on-the-record as of the date of this letter, so not only could the defendant withdraw his plea "for any or no reason," Fed. R. Cr. P. Rule 11(d)(1), but the Sixth Amendment "speedy trial clause [also] applies with full force." *United States v. Roberts*, 515 F. 2d 642 (2d Cir. 1975)

Therefore, the defendant would like to formally assert his speedy trial right and demand a speedy trial on-the-record.



I affirm under penalty of perjury that the foregoing is true and correct. Executed on February 07, 2022.

Respectfully submitted,

Andre Wilburn # 73608-298

MDC Brooklyn

Po Box 329002

Brooklyn, NY 11232

—Certificate of Service—

I, hereby certify that I have on this 07th day of February 2022 served a copy of the foregoing affirmation upon counsel for the government Robert Polemeni, by United States Mail, first-class postage prepaid.



**METROPOLITAN DETENTION CENTER  
80 291<sup>ST</sup> ST. BROOKLYN, NY 11232**

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**The letter has neither been opened nor inspected.**

**If the letter raises a question of law, please inform your**

**attorney, which, in this case, is the jurisdiction. You may wish**

**to return the letter to the office of the**

**or clarification. If the writer wishes to be contacted, please**

**for forwarding to another address, please inform, please**

**return the enclosure to the above address.**